# EX PARTE OR LATE FILED

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ORIGINAL

FILED/ACCEPTED
MAR 10 2008
Federal Communications Commission
Office of the Secretary

***VIA COURIER***

*EX PARTE*

March 10, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Denver Metropolitan Statistical Area,* WC Docket No. 07-97

Dear Ms. Dortch:

Qwest Corporation hereby submits the attached *ex parte* and request for confidential treatment (pursuant to the relevant Protective Orders) of certain confidential and highly confidential information included in the *ex parte*, in the above-captioned proceeding.

One copy of the non-redacted version is being submitted; and two copies of the redacted version are being submitted. For both the redacted and non-redacted versions, an extra copy is provided to be stamped and returned to the courier. Both the redacted and non-redacted versions of the *ex parte* are being served on Staff of the Commission's Wireline Competition Bureau as indicated below. This cover letter does not contain any confidential information.

If you have any questions concerning this submission, please contact me using the information above.

Sincerely,

/s/ Melissa E. Newman

Attachments

cc: (via e-mail)

No. of Copies rec'd 0+2
List ABCDE

Denise Coca (denise.coca@fcc.gov)
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***VIA COURIER***

*EX PARTE*

March 10, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Denver Metropolitan Statistical Area,* WC Docket No. 07-97

Dear Ms. Dortch:

Qwest Corporation ("Qwest") hereby requests confidential treatment of certain information included in the associated *ex parte*. Included is confidential and highly confidential information.

The type of confidential information included (among other similar kinds of data) references estimates by Qwest of its share of residential lines and cable's share of the mass market for telephone services in the Denver, Colorado Metropolitan Statistical Area ("MSA"). The highly confidential information includes an updated version of Exhibit 2 that shows (by wire center) competitive local exchange carrier lines provided via Qwest wholesale products for the Denver MSA.[1]

The confidential information is submitted pursuant to the June 1, 2007 First Protective Order (22 FCC Rcd 10129, DA 07-2292) in WC Docket No. 07-97. The highly confidential information is submitted pursuant to the June 1, 2007 Second Protective Order (22 FCC Rcd 10134, DA 07-2293) in WC Docket No. 07-97. As required by the First and Second Protective Orders, the *ex parte* with confidential information (that is, the non-redacted version) is marked **CONFIDENTIAL – SUBJECT TO FIRST PROTECTIVE ORDER IN WC DOCKET NO. 07-97 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**, and the highly confidential updated version of Exhibit 2 is marked **HIGHLY CONFIDENTIAL – SUBJECT**

[1] Exhibit 2 was submitted initially to the Commission on April 27, 2007.

**TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 07-97 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.** Pursuant to the First and Second Protective Orders, Qwest requests that the non-redacted version of this *ex parte* (containing confidential and highly confidential information) be withheld from public inspection.

Qwest considers this confidential and highly confidential information as being extremely competitively-sensitive in nature. This type of information is "not routinely available for public inspection" pursuant to both Commission rules 47 C.F.R. §§ 0.457(d) and 0.459 (as Qwest explained and for which it provided legal justification in its Request for Confidential Treatment and Confidentiality Justification submitted with its four Petitions for Forbearance (including the one for the Denver, Colorado MSA) on April 27, 2007.

Qwest is simultaneously submitting, under separate covers, a non-redacted and a redacted version of the associated *ex parte.* The redacted version of the *ex parte* is marked "**REDACTED - FOR PUBLIC INSPECTION**". Both the redacted and non-redacted versions of the *ex parte* are the same except that in the non-confidential version the confidential information has been omitted and the updated version of Exhibit 2 is not included. This cover *ex parte* letter contains no confidential information.

If you have any questions concerning this submission, please call me on 303-383-6653.

Sincerely,

/s/ Daphne E. Butler

Qwest
1801 California Street, 10th Floor
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Phone 303-383-6653
Facsimile 303-896-1107

**Daphne E. Butler**
Corporate Counsel

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March 10, 2008

*EX PARTE*

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Denver Metropolitan Statistical Area,* WC Docket No. 07-97

Qwest Corporation ("Qwest") files this *ex parte* to update data provided in the Brigham/Teitzel Declaration filed by Qwest on April 27, 2007. Specifically, Qwest is updating data for the Denver Metropolitan Statistical Area ("MSA") regarding: (1) Qwest access lines; (2) competitive local exchange carrier ("CLEC") facilities-based lines, including an estimate of cable operators' share of these lines; (3) Qwest wholesale lines provided to CLECs; and (4) wireless-only (*i.e.*, "cut the cord") households. Qwest believes that the Federal Communications Commission ("Commission") should consider this updated data. The reasons for the Commission's refusal to reconsider Verizon's updated 2007 data do not apply here. First, Qwest's updated data includes all of Qwest's line counts, whereas the Commission found that Verizon's data failed to include MCI's line counts. Moreover, Qwest's data are being filed almost five months before the fifteen month deadline for action on our petition, which will allow all interested parties sufficient time to review, analyze and comment on Qwest's data.[1]

In the *Verizon 6 MSA Order*, the Commission appears to have adopted a market share test, requiring that the incumbent hold less than 50 percent market share for mass market

[1] *See In the Matter of Petitions of the Verizon Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence and Virginia Beach Metropolitan Statistical Areas*, Memorandum Opinion and Order, 22 FCC Rcd 21293, 21308 n.91 (2007) ("*Verizon 6 MSA Order*"), *appeal pending sub nom. Verizon Telephone v. FCC*, No. 08-1012 (D.C. Cir., filed Jan. 14, 2008).

telephone services in order to forbear from the requirement of loop and transport unbundling.[2] While the market shares in paragraph 27 are redacted, the Commission states in paragraph 30 that it does not stray from dominant carrier treatment where a carrier has more than 50 percent of the market. In Paragraph 36 the Commission rejects unbundling relief because, "Verizon is not subject to a sufficient level of facilities-based competition in the 6 MSAs to grant relief." The Commission appears to have measured facilities-based competition by market share, rather than by the existence of facilities, because the Commission acknowledged that the 75 percent threshold was met in some wire centers, and stated that forbearance might be warranted in such wire centers, upon a showing of a more competitive environment.

This market share test is a departure from the *ACS* and *Omaha* decisions, in which the Commission measured competition by the presence of non-ILEC last mile telecommunications facilities. In the *ACS Order* the Commission relied on the presence of facilities-based competitors, stating that its

> . . . reliance on extensive facilities-based coverage for determining where forbearance is warranted stems from the importance facilities-based last-mile deployment plays in lessening the need for regulatory intervention. As the Commission previously has found, the telecommunications industry is characterized by high fixed and sunk costs, network effects, and economies of scale, among other barriers to entry. When a new market entrant has overcome these barriers by investing heavily enough in its own facilities that it satisfies the last-mile coverage threshold we adopt here, we believe the new entrant has demonstrated a deep commitment to compete vigorously for customers. In areas where competitive last-mile facilities deployment satisfies the coverage threshold we set forth above, we have solid evidence that the competitive entrant in all probability will be able to fulfill those commitments.[3]

In the *Omaha* order the Commission stated that it would forbear where there was sufficient facilities-based competition from Cox, and then announced its 75 percent facilities coverage threshold.[4]

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[2] *See id.* at 21307-08 ¶¶ 27, 30 and 36.

[3] *In the Matter of Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act of 1934, as Amended, for Forbearance from Sections 251(c)(3) and 252(d)(1) in the Anchorage Study Area*, Memorandum Opinion and Order, 22 FCC Rcd 1958, 1977 ¶ 31 (2007) (footnotes omitted), *appeals dismissed for lack of standing*, *Covad Communications Group, Inc. v. FCC*, Nos. 07-70898, 07-71076 and 07-7122 (9th Cir. 2007).

[4] *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Omaha Metropolitan Statistical Area, Memorandum Opinion and Order*, 20 FCC Rcd 19415, 19445-46 ¶¶ 61 and 62 (2005) ("*Omaha Forbearance Order*"), *pets. for rev. dismissed and denied on the merits*, *Qwest v. FCC*, 482 F.3d 471 (D.C. Cir. 2007).

Prior unbundling decisions in the courts and before the Commission have not adopted a market share test either. The D.C. Circuit stated in its *USTA II* decision that the Commission cannot "simply ignore facilities deployment along similar routes when assessing impairment."[5] In its *Triennial Review Order,* the Commission defined impairment to focus on whether lack of a network element "poses a barrier or barriers to entry, including operational and economic barriers, that are likely to make entry into a market uneconomic."[6] The Commission did not focus on whether competitors in the residential market had achieved a market share greater than 50%.

In the *USTA* decision the D.C. Circuit cautioned the Commission against imposing the costs of unbundling if doing so would not bring on a significant enhancement of competition.[7] In the *Triennial Review Order*, when deciding to end the requirement that ILECs offer line-sharing as a UNE, the Commission noted that the fact that broadband service is actually available through another network platform and may be available through additional platforms helps alleviate any concern that competition in the broadband market may be heavily dependent upon unbundled access to the high frequency portion of the loop. The Commission noted that the benefits to consumers of unbundling were reduced because there would be some measure of competition without unbundling. That decision is in line with the 1996 Act's ultimate goal of providing consumers with the benefits of competition, rather than providing benefits to CLEC competitors.[8]

Similarly, in the Denver MSA, loop and transport unbundling does not bring a significant enhancement to local exchange competition, even if it benefits certain CLEC competitors. That

[5] *USTA v. FCC*, 359 F.3d 554, 575 (D.C. Cir. 2004) ("*USTA II*").

[6] *See, e.g., In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Deployment of Wireline Services Offering Advanced Telecommunications Capability,* Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, 18 FCC Rcd 16978, 17035 ¶ 84 (2003), *corrected by Triennial Review Order Errata,* 18 FCC Rcd 19020 (2003) (subsequent history omitted).

[7] *USTA v. FCC*, 290 F.3d 415, 429 (D.C. Cir. 2002) ("*USTA I*").

[8] Because competition without UNEs is possible in the Denver MSA -- not to mention successful -- the impairment standard in section 251(d)(2) is not met. Intermodal local exchange competitors such as wireless and cable are robust competitors without reliance upon Qwest's UNEs. Therefore, it makes no sense to impose unbundling requirements on Qwest, which is one of several competitors. The Commission may not retain unbundling requirements where the evidence shows that the impairment standard is not met. *USTA I*, 290 F.3d at 422 (Commission may not impose unbundling "without regard to the state of competitive impairment in any particular market.") The fact that competitors can viably compete without UNEs "precludes a finding that the [competitors] are impaired by lack of access to the element under § 251(c)(3)." *USTA II*, 359 F.3d at 593) (internal quotation omitted).

is, the existence of intermodal alternatives (cable and wireless) in the residential market reduces the benefits to consumers of unbundling, because there would be vigorous competition even without unbundling.[9] In fact, as shown below the vast majority of CLEC competition in the Denver MSA comes from cable, and thus would exist without unbundling. Thus, the cost benefit analysis for unbundling in the Denver MSA is quite different from the same analysis in a geographic area without facilities-based competitors offering competitive services via entirely separate network platforms. In the Denver MSA, UNEs just are not "vital to the continued development of competition in the local exchange market."[10]

Even though the market share test is ill-advised, Qwest followed the methodology laid out in the *Verizon 6 MSA Order*, and evaluated its own residential access line counts, along with CLEC residential line counts (*i.e.*, including estimated cable, as well as actual resale, and QPP lines) and "cut the cord" wireless customer data. Based on this analysis, and as shown in the Appendix, Qwest estimates that its share of residential lines in the Denver MSA is now less than **[begin confidential]** **[end confidential]** percent of the Denver, Colorado MSA. Qwest estimates this market share by employing the two-step procedure used in Appendix B of the *Verizon 6 MSA Order*, with one modification. As described more fully below in Section C, Qwest assumes that 13.6 percent of households have cut-the-cord.[11]

Qwest has previously provided estimates for CLEC residential facilities-based access lines in the Denver MSA.[12] As described below in Section B., Qwest updates that figure to **[begin confidential]** **[end confidential]**. Of those, Qwest estimates that more than **[begin confidential]** **[end confidential]** are provided by cable operators. In the event of a Commission request, Qwest would be willing to provide the Commission with specific numbers. Qwest takes a conservative, aggregated reporting approach here in light of public carrier challenges to the use and disclosure of carrier line information in the Verizon 6 MSA proceeding.

However, the Commission must understand that the white page listings data only allow Qwest to calculate an estimate of the rapidly increasing number of CLEC and cable telephony facilities-based lines for the Denver MSA. This is especially so since customers of facilities-based telecommunications services providers may instruct their service providers not to submit their telephone numbers for inclusion in the white pages listings database, in which case white

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[9] *Triennial Review* Order, 18 FCC Rcd at 17136 ¶ 263.

[10] *Covad v. FCC*, 450 F.3d 528, 535 (D.C. Cir. 2006).

[11] As described more fully below in Section C., the Centers for Disease Control now estimates that 13.6% of households exclusively subscribe to a mobile wireless service. This is a conservative estimate for the Denver MSA, since as described in Section C., other data suggests that the proportion of wireless subscribers that have "cut the cord" in Denver well exceeds the national average.

[12] *See* ¶ 23 of the Brigham/Teitzel Declaration.

pages listings do not account for the existence of such customers at all. Ultimately, the most accurate source of cable operators' line counts is the cable operators themselves. Qwest therefore urges the Commission to obtain access line data from Comcast as it did in the Verizon 6 MSA proceeding and as it obtained from Cox in the Omaha proceeding. Similarly, although the Commission chose not to verify other CLEC facility-based lines in the Verizon 6 MSA proceeding, Qwest believes that the Commission should take the simple step of verifying facility-based lines provided by the non-cable CLECs in the Denver MSA. Ignoring this segment of the market results in an incomplete market analysis.

**A. Qwest Access Lines**

In the fifth paragraph of the Brigham/Teitzel Declaration, Qwest provided a table reflecting the dramatic decline in its retail residential, business and public coin access line base in the Denver MSA between December 2000 and December 2006. Table 1 below updates that data and shows that between December 2006 and December 2007 Qwest has experienced even further losses across all categories of retail access lines in the Denver MSA as competitive forces continue to intensify in that market.

Table 1

Decrease in Qwest Retail Access Lines in the Denver MSA
December 2006 to December 2007

**---------------------------------Begin Confidential------------------------------------**

| Retail Service | Dec. 2006 | Dec. 2007 | Difference | % Decrease |
|---|---|---|---|---|
| Residential | | | | % |
| Business | | | | % |
| Public | | | | % |
| Total | | | | % |

**---------------------------------End Confidential-----------------------------------**

**B. Facilities-Based CLEC Lines**

In paragraph 23 of the Brigham/Teitzel Declaration, Qwest included an estimate of the number of business lines and the number of residential lines that were provided by facilities-based CLECs[13] in the Denver MSA rate centers as of January 2007. As explained in the referenced paragraph, these estimates were derived using white pages listings. Table 2 below updates this data and shows that the estimated number of business and residential lines provided by facilities-based CLECs has grown substantially since January 2007. The remarkable growth in residential facilities-based competitive lines is due in large part to Comcast's highly aggressive marketing efforts in the Denver MSA.[14]

Table 2

Growth in ***CLEC Facilities-Based*** Lines in the Denver MSA
January 2007 to December 2007
As Estimated from White Pages Listings

**------------------------------------------Begin Confidential------------------------------------**

| CLEC Facilities-Based Service | Jan. 2007 | Dec. 2007 | Difference | % Increase |
|---|---|---|---|---|
| Residential | | | | % |
| Business | | | | % |
| Total | | | | % |

**--------------------------------End Confidential-----------------------------------**

**C. "Wireless-Only" Households**

Qwest notes the substantial growth in "wireless only" households (*i.e.*, those households that have disconnected wireline telephone service and now rely exclusively on wireless service for their telecommunications needs). At the time Qwest filed its Petition, the National Center for Health Statistics ("NCHS") -- the research source for the data relied upon by the Commission regarding wireless substitution[15] -- had just released a report showing that the proportion of

[13] Qwest defines "facilities-based" as used in this estimate at paragraph 23 of the Brigham/Teitzel Declaration and in footnote 25 of its reply comments. *See* Reply Comments of Qwest, WC Docket No. 07-97, filed Oct. 1, 2007 at 10 n.25.

[14] In fact, Comcast recently proclaimed itself as this country's fourth largest phone service provider. *See* http://www.comcast.com/About/PressRelease/PressReleaseDetail.ashx?PRID=721, Move Over Bells: Comcast Corporation Becomes The Fourth-Largest Phone Service Provider In The U.S., released January 8, 2008.

[15] The National Center for Health Statistics is an organizational component of the Centers for Disease Control.

households nationwide that had "cut-the-cord" increased to 9.6 percent as of June 2006.[16] Consistent with its past reliance upon the NCHS wireless substitution data, the Commission once again relied upon the most recent NCHS data available in the *Verizon 6 MSA Order*.[17] The Commission observed that the research from the NCHS for the second half of 2006 showed that 12.8 percent of households were exclusively subscribing to a mobile wireless service, and it used that statistic in the calculation of market share detailed in Appendix B of the *Verizon 6 MSA Order*.[18]

On December 10, 2007, the NCHS released its preliminary estimates of wireless substitution for the first half of 2007.[19] According to the NCHS report, this "cord cutter" group had grown to an estimated ***13.6 percent*** by June 2007 -- an increase of four full basis points from June 2006 and nearly one full basis point from December 2006. Further, in its recently released report on the status of wireless competition the Commission acknowledged that Denver is among those U. S. cities where people have been replacing their landlines with wireless at rates even greater than the national average.[20] Given this trend, and coupled with the fact that the NCHS's estimate of wireless substitution is based on data from the *first half of 2007* rather than year-end data, Qwest believes 13.6 percent is a very conservative estimate of households in the Denver MSA that have "cut-the-cord" as of December 2007. As further support for this conclusion, Qwest notes that the Telephia research referenced by the Commission in paragraph 248 of its wireless competition report released February 4, 2008, indicated that the proportion of Denver households that had cut-the-cord as of the second quarter of 2006 was *already* 11.3 percent at that time -- when the national average stood at 9.6 percent.[21] As of July 2006, U. S. Census data shows that there were approximately 1.03 million households in the Denver MSA.[22] Therefore, applying the most current national average "cord cutter" estimate of 13.6 percent -- which Qwest considers to be very conservative for Denver -- to the total number of households in the MSA indicates that approximately 140,000 households have completely replaced their wireline service with wireless service in the Denver MSA.

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[16] *See* ¶ 37 of the Brigham/Teitzel Declaration.

[17] *See Verizon 6 MSA Order*, 22 FCC Rcd at 21323, Appendix B, n.2.

[18] *Id.*

[19] Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, January -- June 2007, rel. Dec. 10, 2007.

[20] Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services, WT Docket No. 07-71, Twelfth Report, rel. Feb. 4, 2008 at 109 ¶ 248.

[21] *See* Brigham/Teitzel Declaration, Exhibit 5 at 4-5.

[22] *See* http://www.census.gov/popest/housing/HU-EST2006-4.html. The Denver MSA encompasses Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson and Park counties.

**D. Wholesale Voice Grade Equivalent Lines Purchased by CLECs**

As explained in paragraph 22 of the Brigham/Teitzel Declaration, Highly Confidential Exhibit 2 provided the total quantity of Qwest wholesale services purchased by CLECs in each Denver MSA wire center as of December 2006, segmented by residential and business line categories. The attached update to Highly Confidential Exhibit 2 demonstrates that the number of CLEC lines provided in the Denver MSA via Qwest's wholesale products has increased between December 2006 and December 2007.

**E. Conclusion**

The updated data show that Qwest is continuing to lose access lines, and facilities-based CLECs are continuing to gain access lines. These CLECs had a particularly strong increase in residence access lines during 2007. Qwest's share of the mass market continues to fall as intramodal and intermodal competition continues to intensify. In light of this competition, it is clear that TELRIC rates are not necessary to ensure just and reasonable prices. These rates harm consumers, rather than protecting them, because disadvantaging Qwest by forcing it to share its facilities at artificially low rates undermines the potential for growth of facilities-based intramodal and intermodal competition. Eliminating unbundling at TELRIC rates would be in the public interest because the benefits are few, while the costs are significant. Where there is such robust facilities-based competition that does not rely upon Qwest's loop facilities, the Commission cannot justify continuing to impose the costs of unbundling and dominant carrier regulation.

Respectfully submitted,

/s/ Daphne E. Butler

# APPENDIX

**Denver MSA - Estimated Residential Market Share**

__Step 1:__

Qwest + CLEC = (1-.136) * $C_{telephone}$
Where,
$C_{telephone}$ = The total number of customers that have telephone service (wireline or wireless)
Qwest = Qwest residential local service customers
CLEC = Qwest Resold Lines + Qwest Residential Platform Service Lines (QLSP + QPP) + Cable Providers' [Estimated] Residential Access Lines

$C_{telephone}$ = (Qwest + CLEC)/(1-.136)

| | | |
|---|---|---|
| **Qwest Residential** | **Redacted** | (December 2007 data; see Section A) |
| **CLEC Residential** | | |
| Qwest Residential Resold Lines | Redacted | (December 2007 data from updated highly confidential Exhibit 2) |
| Qwest Residential Platform-Based Lines | Redacted | (December 2007 data from updated highly confidential Exhibit 2) |
| 90% of Estimated Facilities-Based CLEC Residential Lines | Redacted | (Based on December 2007 listings for Denver MSA rate centers) |
| **CLEC Total** | **Redacted** | |

**$C_{telephone}$ = (Qwest + CLEC)/(1-.136)**

__Equals__: **Redacted**

**$Wireless_{CTC}$ =** $C_{telephone}$ - Qwest - CLEC

__Equals__: **Redacted**

__Step 2:__

**Estimated Qwest Market Share [$Qwest_{MS}$] =** [Qwest + Qwest $Wireless_{CTC}$] / [Qwest + CLEC + $Wireless_{CTC}$]

__Equals__: **Redacted**

**Estimated CLEC + Competitive Wireless Market Share =** **Redacted**

__Note__: Qwest's estimated share of wireless in the Denver MSA, per TNS Telecoms = **Redacted** (see footnote 18 in Brigham/Teitzel declaration)
**Redacted Redacted** __Equals__: **Redacted**

**REDACTED -- FOR PUBLIC INSPECTION**

## DENVER MSA
## CLEC LINES PROVIDED VIA QWEST WHOLESALE PRODUCTS
(Data Vintage: December 2007)

| | | CLEC BUSINESS LINES | | | | | CLEC RESIDENCE LINES | | | BUSINESS + RESIDENCE | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Wire Center | CLLI8 | UNE-L [1] (Dec.'07) | EEL [1] (Dec.'07) | Platform-Based [2] (Dec.'07) | Resale (Dec.'07) | Total (Sum of Col. A thru Col. D) | Platform-Based [2] (Dec.'07) | Resale (Dec.'07) | Total (Sum of Col. F + Col. G) | UNE-L [1] (Dec.'07) | EEL [1] (Dec.'07) | Platform-Based [2] (Dec.'07) | Resale (Dec.'07) | Total (Sum of Col. I thru Col. L) |
| | | A | B | C | D | E | F | G | H | I = A | J = B | K = C + F | L = D + G | M |
| ARVADA | ARVDCOMA | | | | | | | | | | | | | |
| AURORA | AURRCOMA | | | | | | | | | | | | | |
| AURORA MONAGHAN | AURRCOMB | | | | | | | | | | | | | |
| BAILEY | BALYCOMA | | | | | | | | | | | | | |
| BRIGHTON | BITNCOMA | | | | | | | | | | | | | |
| BROOMFIELD | BRFDCOMA | | | | | | | | | | | | | |
| CASTLE ROCK | CSRKCONM | | | | | | | | | | | | | |
| CENTRAL CITY | CNCYCOMA | | | | | | | | | | | | | |
| DECKERS | DCKRCOMA | | | | | | | | | | | | | |
| DENVER CAPITOL HILL | DNVRCOCH | | | | | | | | | | | | | |
| DENVER COLUMBINE | DNVRCOCL | | | | | | | | | | | | | |
| DENVER CURTIS PARK | DNVRCOCP | | | | | | | | | | | | | |
| DENVER DRY CREEK | DNVRCODC | | | | | | | | | | | | | |
| DENVER EAST | DNVRCOEA | | | | | | | | | | | | | |
| DENVER INTL AIRPORT | DNVRCOOU | | | | | | | | | | | | | |
| DENVER MAIN | DNVRCOMA | | | | | | | | | | | | | |
| DENVER MONTBELLO | DNVRCOMB | | | | | | | | | | | | | |
| DENVER NORTH | DNVRCONO | | | | | | | | | | | | | |
| DENVER NORTHEAST | DNVRCONE | | | | | | | | | | | | | |
| DENVER SMOKY HILL | DNVRCOSH | | | | | | | | | | | | | |
| DENVER SOUTH | DNVRCOSO | | | | | | | | | | | | | |
| DENVER SOUTHEAST | DNVRCOSE | | | | | | | | | | | | | |
| DENVER SOUTHWEST | DNVRCOSW | | | | | | | | | | | | | |
| DENVER SULLIVAN | DNVRCOSL | | | | | | | | | | | | | |
| DENVER WEST | DNVRCOWS | | | | | | | | | | | | | |
| ELBERT | ELBRCOMA | | | | | | | | | | | | | |
| ELIZABETH | ELZBCO01 | | | | | | | | | | | | | |
| ENGLEWOOD | ENWDCOMA | | | | | | | | | | | | | |
| ENGLEWOOD ABERDEEN | ENWDCOAB | | | | | | | | | | | | | |
| EVERGREEN | EVRGCOMA | | | | | | | | | | | | | |
| GEORGETOWN | GRTWCOMA | | | | | | | | | | | | | |
| GOLDEN | GLDNCOMA | | | | | | | | | | | | | |
| IDAHO SPRINGS | IDSPCOMA | | | | | | | | | | | | | |
| KIOWA | KIOWCONM | | | | | | | | | | | | | |
| LAKEWOOD | LKWDCOMA | | | | | | | | | | | | | |
| LARKSPUR | LRKSCONM | | | | | | | | | | | | | |
| LITTLETON | LTTNCOMA | | | | | | | | | | | | | |
| LITTLETON HIGHLANDS RANCH | LTTNCOHL | | | | | | | | | | | | | |
| LOOKOUT MOUNTAIN | LKMTCOMA | | | | | | | | | | | | | |
| MORRISON | MRSNCOMA | | | | | | | | | | | | | |
| NORTHGLENN | NGLNCOMA | | | | | | | | | | | | | |
| PARKER | PRKRCOMA | | | | | | | | | | | | | |
| WESTMINSTER | WMNSCOMA | | | | | | | | | | | | | |
| **TOTALS - DENVER MSA** | | | | | | | | | | | | | | |

Note 1: Consistent with the methodology ordered by the FCC in its TRRO, wholesale DS1 services are counted at full capacity of 24 DS0s and DS3 services are counted at full capacity of 672 DS0s. Unlike with other wholesale categories, Qwest has no way of determining whether UNE-L and EEL lines are used by the CLEC to serve business customers or residence customers. Because Qwest believes these lines are predominantly being used to serve business customers, they are accounted for in the Business Lines section of this analysis.

# DENVER MSA
## CLEC LINES PROVIDED VIA QWEST WHOLESALE PRODUCTS
(Data Vintage: December 2007)

| | | CLEC BUSINESS LINES | | | | | CLEC RESIDENCE LINES | | | BUSINESS + RESIDENCE | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Wire Center | CLLI8 | UNE-L [1] (Dec.'07) | EEL [1] (Dec.'07) | Platform-Based [2] (Dec.'07) | Resale (Dec.'07) | Total (Sum of Col. A thru Col. D) | Platform-Based [2] (Dec.'07) | Resale (Dec.'07) | Total (Sum of Col. F + Col. G) | UNE-L [1] (Dec.'07) | EEL [1] (Dec.'07) | Platform-Based [2] (Dec.'07) | Resale (Dec.'07) | Total (Sum of Col. I thru Col. L) |
| | | A | B | C | D | E | F | G | H | I = A | J = B | K = C + F | L = D + G | M |
| | | | | | | | | | | | | | | |

Note 2: Platform-based lines shown in this column include the sum of QPP, QLSP and UNE-P lines.